

From: JanisK@STA [mailto:janisK@SteppingThruAccessibility.com]
Sent: Monday, October 29, 2012 2:41 PM
To: CBSC@DGS
Cc: Eric Sifuentes
Subject: sinks

Jim-

Please review the following. The way this is written, in cannot be done, but it can be if the typical knee & toe clearance is provided similar to a lavatory.

If you look at 11B.306.3.3 exception 2 which states basically you need a 19" deep x 27" ht rectangular clr space below a sink - you cannot place a p-trap due to the required pipe radius which is 1.5" - you would have 4.5" (for the 3 required radiuses) & then an additional 3" for piping thickness - so you would have $19" + 7.5" = 26.5"$ deep and this does not even include any pipe insulation nor does it include any straight run of piping.

Please see diagram D attached - the counter would be way over any required depth. I believe it should be allowed to have the typical knee & toe clearance below similar to a lavatory rather than the rectangular space below a dining table. The only way this would work would be to have the faucet & controls along with the drainage & p-trap piping off to the side. Was this the intent? - I am not sure this is allowed either

11B-306.3.3 Minimum Required Depth. Where knee clearance is required under an element as part of a clear floor space, the knee clearance shall be 11 inches (280 279 mm) deep minimum at 9 inches (230 229 mm) above the finish floor or ground, and 8 inches (205 203 mm) deep minimum at 27 inches (685 686 mm) above the finish floor or ground.

EXCEPTIONS:

2. At sinks required to be accessible by 11B-212.3, knee clearance shall extend 19 inches (483 mm) deep minimum at 27 inches (685 686 mm) above the finish floor or ground.

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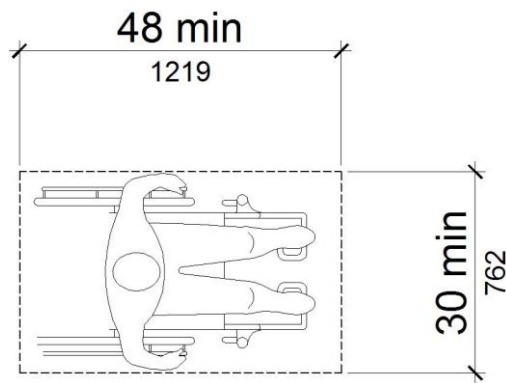


Figure 11B-305.3
Clear Floor or Ground Space

11B-305.4 Knee and Toe Clearance. Unless otherwise specified, clear floor or ground space shall be permitted to include knee and toe clearance complying with 11B-306.

11B-305.5 Position. Unless otherwise specified, clear floor or ground space shall be positioned for either forward or parallel approach to an element.

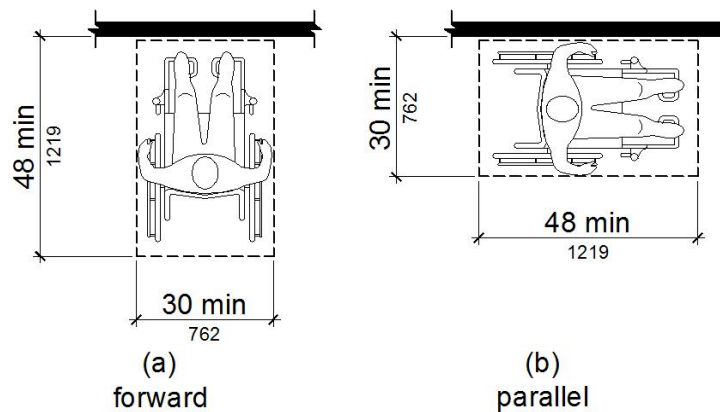
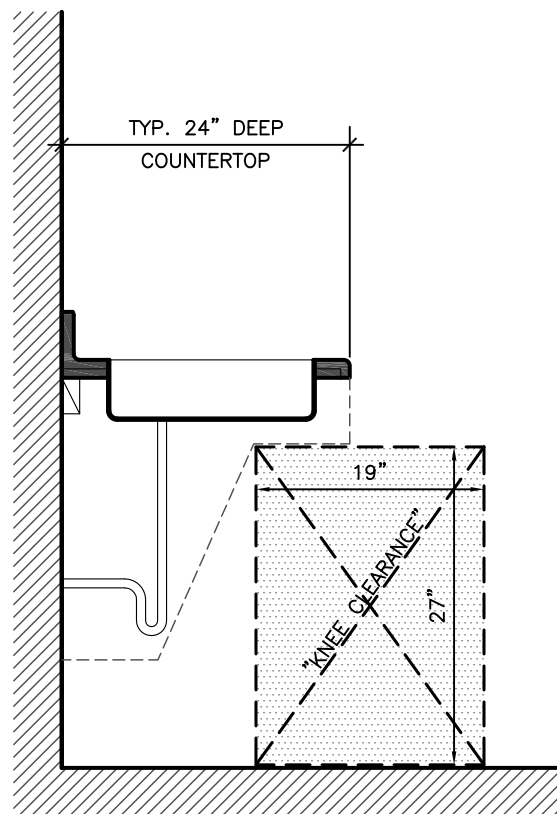


Figure 11B-305.5
Position of Clear Floor or Ground Space

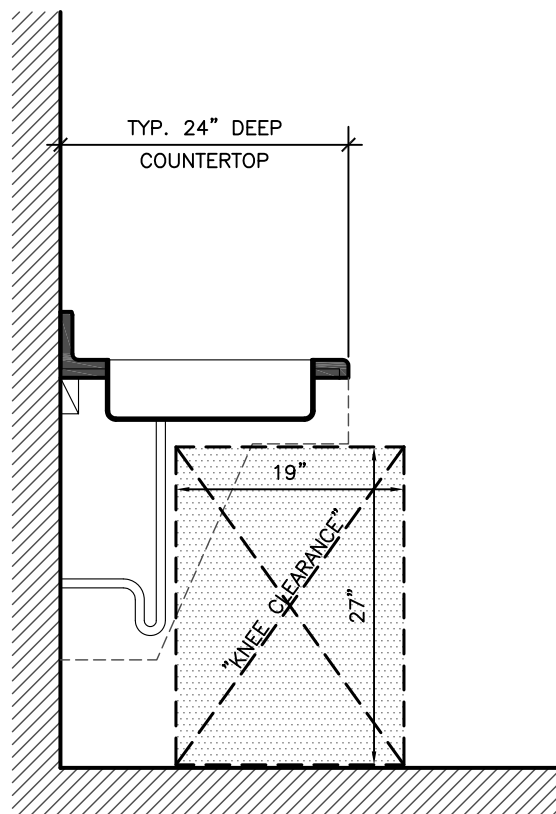
11B-305.6 Approach. One full unobstructed side of the clear floor or ground space shall adjoin an accessible route or adjoin another clear floor or ground space.

11B-305.7 Maneuvering Clearance. Where a clear floor or ground space is located in an alcove or otherwise confined on all or part of three sides, additional maneuvering clearance shall be provided in accordance with 11B-305.7.1 and 11B-305.7.2.

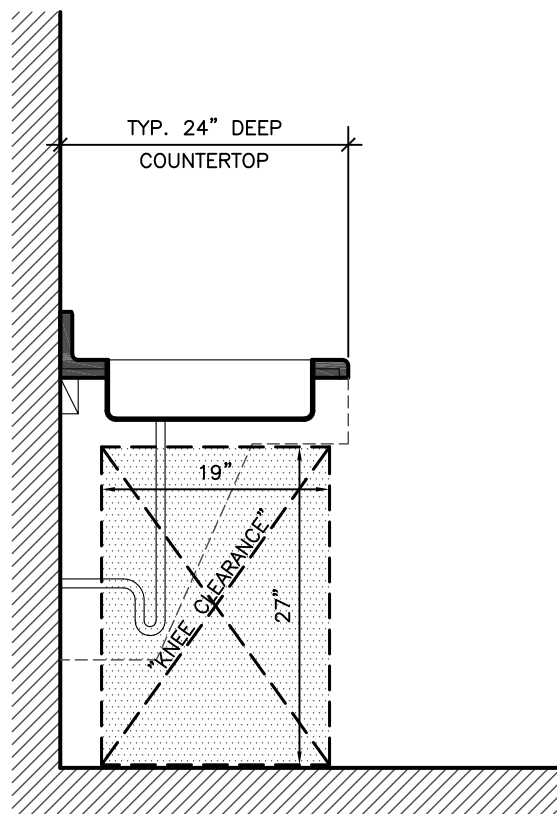
11B-305.7.1 Forward Approach. Alcoves shall be 36 inches (914 mm) wide minimum where the depth exceeds 24 inches (610 mm).



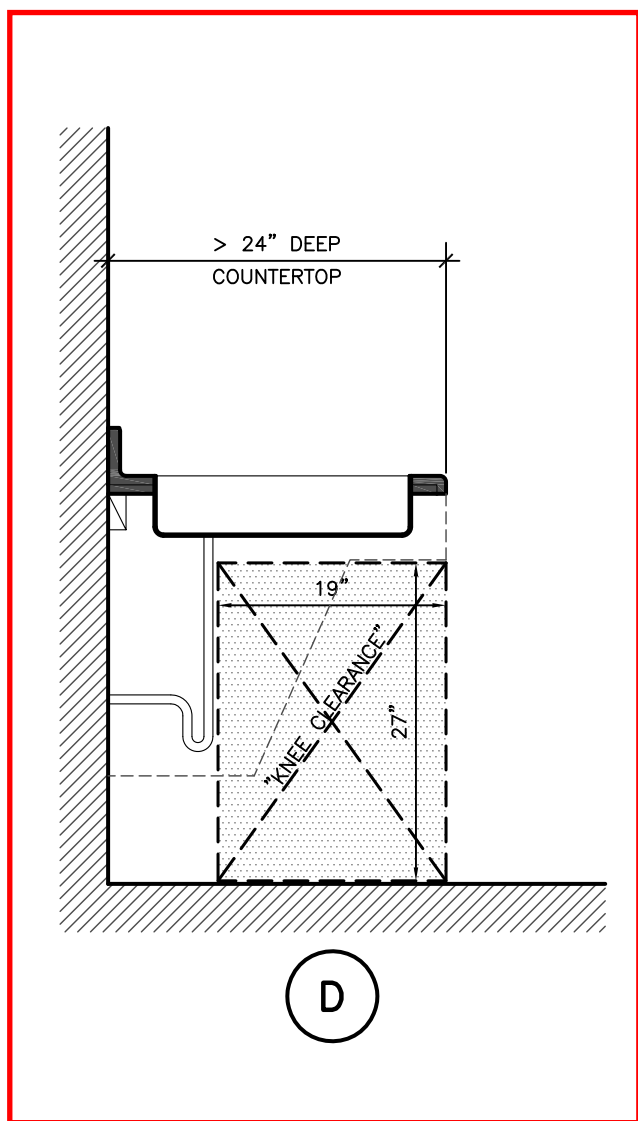
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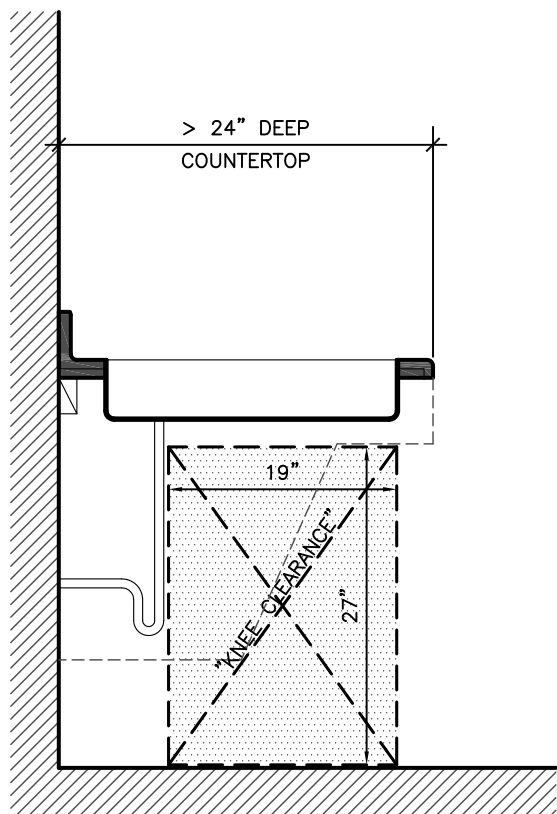
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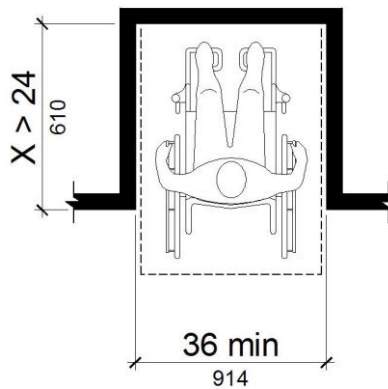


Figure 11B-305.7.1
Maneuvering Clearance in an Alcove, Forward Approach

11B-305.7.2 Parallel Approach. Alcoves shall be 60 inches (~~1525~~ 1524 mm) wide minimum where the depth exceeds 15 inches (~~380~~ 381 mm).

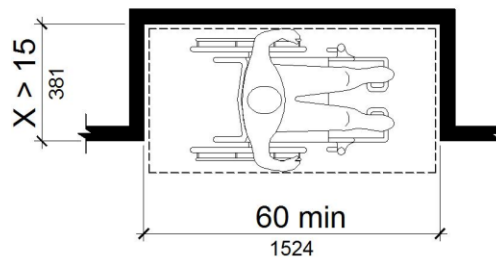


Figure 11B-305.7.2
Maneuvering Clearance in an Alcove, Parallel Approach

11B-306 Knee and Toe Clearance

11B-306.1 General. Where space beneath an element is included as part of clear floor or ground space or turning space, the space shall comply with 11B-306. Additional space shall not be prohibited beneath an element but shall not be considered as part of the clear floor or ground space or turning space.

11B-306.2 Toe Clearance.

11B-306.2.1 General. Space under an element between the finish floor or ground and 9 inches (~~230~~ 229 mm) above the finish floor or ground shall be considered toe clearance and shall comply with 11B-306.2.

11B-306.2.2 Maximum Depth. Toe clearance shall extend 25 inches (635 mm) maximum under an element.

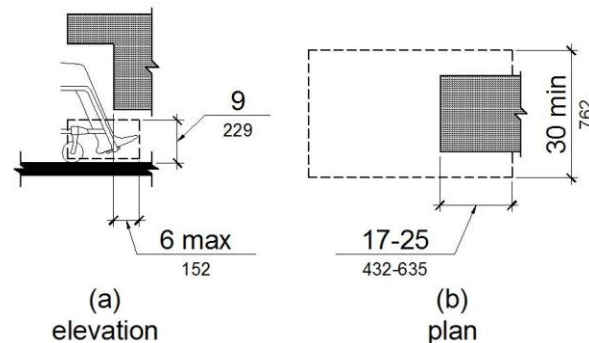
11B-306.2.3 Minimum Required Depth. Where toe clearance is required at an element as part of a clear floor space, the toe clearance shall extend 17 inches (~~430~~ 432 mm) minimum under the element.

EXCEPTIONS: 1. The toe clearance shall extend 19 inches (483 mm) minimum under sinks required to be accessible by 11B-212.3.

2. The toe clearance shall extend 19 inches (483 mm) minimum under built-in dining and work surfaces required to be accessible by 11B-226.1.

11B-306.2.4 Additional Clearance. Space extending greater than 6 inches (~~150~~ 152 mm) beyond the available knee clearance at 9 inches (~~230~~ 229 mm) above the finish floor or ground shall not be considered toe clearance.

11B-306.2.5 Width. Toe clearance shall be 30 inches (~~760~~ 762 mm) wide minimum.



**Figure 11B-306.2
Toe Clearance**

11B-306.3 Knee Clearance.

11B-306.3.1 General. Space under an element between 9 inches (~~230~~ 229 mm) and 27 inches (~~685~~ 686 mm) above the finish floor or ground shall be considered knee clearance and shall comply with 11B-306.3.

EXCEPTION: *At lavatories required to be accessible by 11B-212.3, space between 9 inches (229 mm) and 29 inches (737 mm) above the finish floor or ground under, shall be considered knee clearance.*

11B-306.3.2 Maximum Depth. Knee clearance shall extend 25 inches (635 mm) maximum under an element at 9 inches (~~230~~ 229 mm) above the finish floor or ground.

EXCEPTION: *Knee clearance shall extend 19 inches (483 mm) maximum under lavatories required to be accessible by 11B-212.3.*

11B-306.3.3 Minimum Required Depth. Where knee clearance is required under an element as part of a clear floor space, the knee clearance shall be 11 inches (~~280~~ 279 mm) deep minimum at 9 inches (~~230~~ 229 mm) above the finish floor or ground, and 8 inches (~~205~~ 203 mm) deep minimum at 27 inches (~~685~~ 686 mm) above the finish floor or ground.

EXCEPTIONS: 1. *At lavatories required to be accessible by 11B-212.3, the knee clearance shall be 27 inches (686 mm) high minimum above the finish floor or ground at a depth of 8 inches (203 mm) minimum increasing to 29 inches (737 mm) high minimum above the finish floor or ground at the front edge of a counter with a built-in lavatory or at the front edge of a wall-mounted lavatory fixture.*

At lavatories required to be accessible by 11B-212.3, the knee clearance shall be 29 inches (686 mm) high minimum above the finish floor or ground at the front bottom edge of the lavatory reducing to 27 inches (686 mm) above the finish floor or ground at a minimum depth of 8 inches (203 mm).

2. *At sinks required to be accessible by 11B-212.3, knee clearance shall extend 19 inches (483 mm) deep minimum at 27 inches (685 686 mm) above the finish floor or ground.*

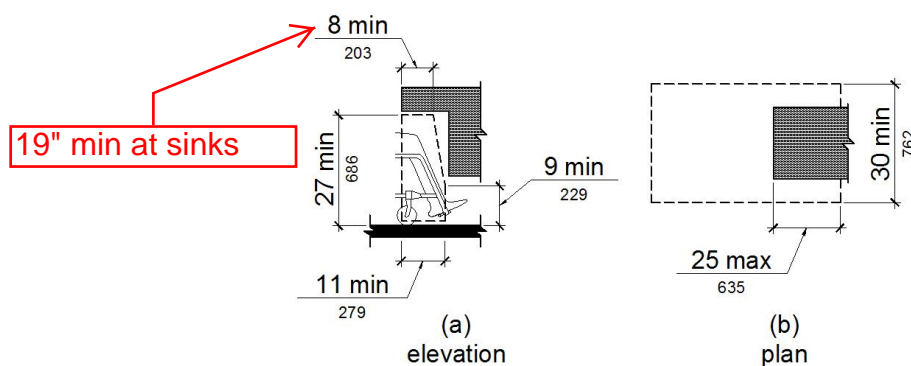
3. At built-in dining and work surfaces required to be accessible by 11B-226.1, knee clearance shall extend 19 inches (483 mm) deep minimum at 27 inches (685 686 mm) above the finish floor or ground.

11B-306.3.4 Clearance Reduction. Between 9 inches (230 229 mm) and 27 inches (685 686 mm) above the finish floor or ground, the knee clearance shall be permitted to reduce at a rate of 1 inch (25 mm) in depth for each 6 inches (450 152 mm) in height.

EXCEPTIONS: 1. The knee clearance shall not be reduced at sinks required to be accessible by 11B-212.3.

2. The knee clearance shall not be reduced at built-in dining and work surfaces required to be accessible by 11B-226.1.

11B-306.3.5 Width. Knee clearance shall be 30 inches (760 762 mm) wide minimum.



**Figure 11B-306.3
Knee Clearance**

11B-307 Protruding Objects

11B-307.1 General. Protruding objects shall comply with 11B-307.

11B-307.2 Protrusion Limits. Objects with leading edges more than 27 inches (685 686 mm) and not more than 80 inches (2030 2032 mm) above the finish floor or ground shall protrude 4 inches (400 102 mm) maximum horizontally into the circulation path.

EXCEPTION: Handrails shall be permitted to protrude 4½ inches (445 114 mm) maximum.